

**FREQUENTLY ASKED QUESTIONS (FAQ) ON  
WIA 35% HIGH WAGE JOB TRAINING EXPENDITURE REQUIREMENT  
8/31/06**

- 1. Why is DWD implementing the 35% high wage job training requirement?**  
We need to make a greater effort towards moving people being served through our Job Center system into jobs that will help them achieve financial stability. We have also heard from employers that they need more skilled workers. The 35% requirement helps address our skilled workforce challenge and will assist businesses in expanding their workforce and growing our economy.
- 2. Does DWD have anything specific in mind for sources other than the *Graduate Follow-up Report* in determining whether certain training will qualify for the 35% requirement?**  
DWD does not have anything specific in mind for sources other than the *Graduate Follow-up Report*. The WDB needs to assess the information from the training providers to determine if the training meets the median wage requirement for the WDA. The WDB should have documentation in place to verify that this training meets the median wage rate.
- 3. What can WDBs do in a situation when the course is relatively new and no graduate data exists?**  
WDBs have the flexibility to use the statewide Wisconsin Technical College *Graduate Follow-up Report* or the follow-up report issued by a technical college located in that WDA. WDBs will need this type of information to document that the training program meets the 35% high wage job training criteria. In addition, the Department is interested in other sources of data to better identify occupations and wages. WDBs should not deny training if wage data is not readily available.
- 4. What is the impact if the WDB was originally counting a participant's training toward the 35% requirement and the individual fails to complete the career path?**  
Through assessment and counseling, the WDB must become skilled at identifying those who are interested and suitable candidates for training which will eventually lead to placement in a position paying at the median wage. However, the participant's failure to complete a career path included in the Employability Plan, will not be considered a failure under the 35% policy. Allowed costs can be included in the 35% amount.
- 5. How was the median wage calculated?**  
The median wage information was garnered through the Federal DOL's Bureau of Labor Statistics with a software package called Estimates Delivery System (EDS) to generate custom estimates. This package uses the EDS sample data from the county or group of counties selected to create the wage and employment estimates.
- 6. How often will the median wage be updated?**  
The Department of Workforce Development (DWD) anticipates updating the median wage once a year.

- 7. For those businesses that either don't fall into the 35% window because of their industry type or due to the type of support they require, are WDBs supposed to deny them services?**

DWD has asked WDBs to target and form good working relationships with high wage, high growth employers. We have not said that they cannot have a relationship with employers who do not fall into that category. However, working with these high growth, high wage employers will help the WDB reach its performance goals and support the GROW Wisconsin initiative by helping to move families into family sustaining jobs.
- 8. For those individuals that are either not qualified or interested in training that would fall into the 35% goal, are WDBs supposed to deny them training services?**

No. We are asking WDBs to use a little over a third of their Adult and local Dislocated Worker dollars and Special Response grant dollars less the 10% for administration to devote to training that would lead to high wage jobs. Sixty-five percent of their WIA allocation remains to support core, intensive and training services that do not meet the high wage job training criteria. DWD expects WDBs to continue to serve individuals as required under the WIA program and allowed for the various categories of service.
- 9. If an occupation previously met/exceeded the median wage but no longer does, what is the impact on the 35% goal?**

We will be looking at the median wage at the point that the person entered training if prior to July 1, 2006, or when the 35% requirement was implemented, i.e., July 1, 2006, whichever is appropriate.
- 10. How will WDBs track training expenditures?**

WDBs will track training expenditures for monitoring purposes through the CORE system using a special coding process.
- 11. Are OJT and Customized Skills training included in the 35% requirement?**

Yes, OJT and Customized Skills training may be used to meet the 35% requirement as long as the training is in a high wage occupation as identified on the *Graduate Follow-up Report* or the follow-up report issued by a technical college located in that WDA.
- 12. Is this 35% expenditure goal tied strictly to participants enrolled in training?**

Yes, this is an investment in training for high wage occupations. The participant must be enrolled in training in order to have these costs count towards meeting the 35% requirement.
- 13. If we have a participant who is enrolled in core services, receives some support services while in core services and then moves into a training service, do we include those core services support payments in the 35%?**

No, only training related support services can be counted. We are willing to count supportive services and career ladder type training before the training in high wage occupations provided it is part of a clear individual employment plan.

**14. Can a WDB count the costs for supportive services, e.g., child care, towards meeting the 35% requirement for a participant who is enrolled in Trade Adjustment Assistance (TAA) training?**

Yes, if the training program the TAA participant is enrolled in meets the median wage requirement for the WDA, WIA supportive service funding for that participant may be counted towards meeting the 35% high wage job requirement.

**15. At what point do we measure whether we have met the 35% training requirement for a participant?**

This is measured from the point the participant enters the training program. For example, a participant begins training to be a Computerized Numerical Control Machine Operator/Programmer. The WDB determines whether the training qualifies by comparing the median wage for recent graduates using the Wisconsin Technical College *Graduate Follow-up Report* to the Workforce Development Area's median wage requirement. If the median wage for this particular training shows a median wage above the WDA's median wage requirement, it can count towards meeting the 35% high wage job training requirement. Actual placement in a job following completion of the training is not required though obviously encouraged.

**16. If the WDB has a participant whose training they are counting towards meeting the 35% high wage job training requirement because they qualify under the career ladder qualifier, how much progress does that participant have to make in a program year?**

What we are looking for is measurable and continuous progress towards meeting the employment goal included in the participant's employment plan. For example, we would include an individual whose employability plan includes a goal of becoming a Licensed Practical Nurse (LPN) who completes the CNA training and goes on to complete the first semester's requirements towards the LPN degree during the program year.

**17. When will DWD determine whether a WDB met the 35% High Wage Job Training Requirement?**

The Department will be monitoring this throughout Program Year 2006. During fiscal and programmatic monitoring in the spring of 2007, Department staff will review WDBs' efforts to meet this requirement. While Program Year 2006 will be a data gathering year and no sanctions will be imposed for failing to meet this requirement, WDBs will have to provide evidence that they tried to meet the requirement and, if they are unable to meet it, explain why they were not able to meet the requirement.

**18. What is the potential impact of the 35% High Wage Job Training Requirement on both local and state performance?**

DWD believes this change will be reflected positively in our WIA performance outcomes. Recent changes in federal definitions, which apply to all participants entering WIA Title I programs on or after July 1, 2006 and policies for the certificate/credential measures substantially alter the way states and local providers think about certificate and credential attainment. It is clear from changes in the federal definition that training is expected to relate to a higher employment expectation than simply obtaining an entry-level job. The new definition sets a much higher bar for attainment and success than WDBs have previously been held to. Most of the activities for which local boards have received credentials in the past no longer meet the definition of a certificate or credential under the new, more clearly stated, federal

definition. We believe the 35% requirement coincides with the change in federal policy and will help WDBs succeed under the new certificate/credential definitions.

**19. What impact, if any, does meeting the 35% High Wage Job Training Requirement have on eligibility for WIA Title I performance incentive awards?**

Currently none. In the WIA Local Plan Guidelines Part 2, the Department included System Measures for Program Year 2006 which included the 35% High Wage Job Training requirement. While there has been discussion of revising the incentive award policy to include system measures, that proposed change will be discussed as part of the work of the 35% High Wage Job Training requirement workgroup which will look at a number of issues related to this policy.

**WIA 35% RESOURCE LIST**

Admin Memo on WIA 35% Expenditure Requirement for Training Leading to High Wage Jobs  
<http://www.dwd.state.wi.us/dws/adminmemos/pdf/2006/0611.pdf>

Wisconsin Technical College *Graduate Follow-up Report*  
[www.wtcsystem.edu/reports/fact/graduate/index.htm](http://www.wtcsystem.edu/reports/fact/graduate/index.htm)